

| LULAC V. ABBOTT, 3:21-cv-00259-DCG-JES-JVB | | | | | | | |
|---|-----------|-----------------------------------|---------------|----------------------------|--|--|--|
| LULAC PLAINTIFFS' AMENDED LOG OF PRIVILEGED MATERIALS | | | | | | | |
| Bates Number | Custodian | Date Document Prepared or Created | Document Type | Author or Sender | Recipients | Privilege or Protection Asserted | Description |
| LULAC0051 | MABA-TX | 1/4/2022 | PDF | Russell Ramirez | | Work Product Doctrine | Confidential email to internal MABA-TX team regarding developments in redistricting lawsuit. |
| LULAC0052 | MABA-TX | 5/7/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force* | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting communications, including attorney analysis, mental impressions, strategy and/or legal advice |
| LULAC0053 - LULAC0054 | MABA-TX | 4/16/2021 | PDF | Russell Ramirez | | Work Product Doctrine | Notes from local MABA-Texas chapter meeting including litigation developments and strategy. |
| LULAC0055 | MABA-TX | 5/11/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding redistricting guide and forthcoming meeting, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0056 - LULAC0059 | MABA-TX | 7/15/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting special session, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0060 - LULAC0061 | MABA-TX | 7/7/2021 | PDF | Lulu Flores | Russell Ramirez | Work Product Doctrine; Attorney-Client Privilege | Confidential email to MABA-TX leadership regarding notes from redistricting meeting, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0062 - LULAC0063 | MABA-TX | 7/1/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force, Nina Perales (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearing, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0064 - LULAC0065 | MABA-TX | 8/12/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding Census developments, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0066 - LULAC0070 | MABA-TX | 8/27/2021 | PDF | Russell Ramirez | | Attorney-Client Privilege; Work Product Doctrine | Notes from Texas Latino Redistricting Task Force meeting regarding Census data release and anticipated litigation, which included attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0071 | MABA-TX | 8/25/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding redistricting hearings, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0072 | MABA-TX | 8/28/2021 | PDF | Russell Ramirez | Nina Perales (Attorney) | Attorney-Client Privilege | Confidential email to counsel regarding redistricting lawsuit. |
| LULAC0073 | MABA-TX | 9/6/2021 | PDF | Benny Agosto | Russell Ramirez | Work Product Doctrine; Attorney-Client Privilege | Confidential email to MABA-TX leadership regarding notes from redistricting meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0074 | MABA-TX | 9/7/2021 | PDF | Belinda Arambula | Russell Ramirez | Work Product Doctrine; Attorney-Client Privilege | Confidential email to MABA-TX leadership regarding notes from redistricting meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0075 - LULAC0076 | MABA-TX | 9/6/2021 | PDF | Russell Ramirez | Belinda Arambula | Work Product Doctrine; Attorney-Client Privilege | Confidential email regarding notes from redistricting meeting. |
| LULAC0077 - LULAC0078 | MABA-TX | 8/25/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and Census developments, including attorney analysis, mental impressions, strategy and/or legal advice. |

| | | | | | | | |
|-----------------------|---------|-----------|-----|----------------------------|--|--|---|
| LULAC0079 | MABA-TX | 9/17/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Lydia Camarillo | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, legislative redistricting special session, and anticipated litigation, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0080 | MABA-TX | 9/29/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Lydia Camarillo, Samantha Serna, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, legislative redistricting special session, and anticipated litigation, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0081 - LULAC0085 | MABA-TX | 9/20/21 | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes from Texas Latino Redistricting Task Force meeting regarding legislative redistricting special session and anticipated litigation, which included attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0086 - LULAC0087 | MABA-TX | 8/28/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email regarding Texas Latino Redistricting Task Force's proposed redistricting plans, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0088 | MABA-TX | 8/28/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email regarding Census data, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0089 | MABA-TX | 4/5/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force; Lydia Camarillo | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and potential litigation, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0090 | MABA-TX | 3/30/2021 | PDF | Fátima Menendez (Attorney) | Russell Ramirez; Lydia Camarillo; Jana Ortega; Gloria Leal; Lulu Flores; Fátima Menendez (Attorney) | Work Product Doctrine; Attorney-Client Privilege | Confidential email to MABA-TX leadership regarding redistricting proposed plan, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0091 | MABA-TX | 3/12/2021 | PDF | Russell Ramirez | | Work Product Doctrine | Internal notes regarding redistricting plan. |
| LULAC0092 | MABA-TX | 3/11/2021 | PDF | Lydia Camarillo | Russell Ramirez; Steven Aleman; Renee De La Cruz; M. Escobar Angelica Hernandez; Gloria Leal; R. Mejia; Jana Ortega; Danny Razo; Gavin Villareal; Belinda Arambula | Work Product Doctrine | Email regarding redistricting legislative hearings. |
| LULAC0093 | MABA-TX | | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes regarding Texas Latino Redistricting Task Force meeting. |
| LULAC0094 - LULAC0096 | MABA-TX | | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes regarding Texas Latino Redistricting Task Force meeting. |
| LULAC0097 | MABA-TX | 2/15/2021 | PDF | Russell Ramirez | Belinda Arambula; Jana Ortega; Lulu Flores; Gloria Leal | Work Product Doctrine | Notes regarding Texas Latino Redistricting Task Force meeting, which included attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0098 | MABA-TX | 2/15/2021 | PDF | Russell Ramirez | Belinda Arambula; Jana Ortega; Lulu Flores; Gloria Leal | Work Product Doctrine | Notes regarding Texas Latino Redistricting Task Force meeting, which included attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0099 | MABA-TX | 1/28/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force; Patricia Gonales; Fátima Menendez (Attorney); Valerie Morales; Russell Ramirez | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and participating in redistricting process, includin attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0100 - LULAC0101 | MABA-TX | 2/5/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force; Nina Perales (Attorney); Patricia Gonzales | Attorney-Client Privilege | Email to Texas Latino Redistricting Task Force regarding legislative committee assignments, including attorney analysis, mental impressions, strategy and/or legal advice. |

| | | | | | | | |
|-----------------------|-----------------|-----------|-----|----------------------------|---|--|---|
| LULAC0102 - LULAC0104 | MABA-TX | 1/29/2021 | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes regarding Texas Latino Redistricting Task Force meeting, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0105 - LULAC0107 | MABA-TX | 1/24/2021 | PDF | Russell Ramirez | Lulu Flores; Martin Garza; | Work Product Doctrine; Attorney-Client Privilege | Email to MABA-TX leadership regarding MABA-TX participation in Texas Latino Redistricting Task Force, upcoming Texas Latino Redistricting Task Force meeting, and redistricting regional hearings, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0108 - LULAC0109 | MABA-TX | 1/23/2021 | PDF | Florinda Chavez | Texas Latino Redistricting Task Force; Fátima Menendez (Attorney); Nina Perales (Attorney) | Attorney-Client Privilege | Email to Texas Latino Redistricting Task Force regarding Texas HOPE membership in Task Force. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0110 - LULAC0111 | MABA-TX | 1/19/2021 | PDF | Russell Ramirez | Lulu Flores | Work Product Doctrine; Attorney-Client Privilege | Email to MABA-TX leadership regarding Texas Latino Redistricting Task Force information on redistricting regional hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0112 - LULAC0113 | MABA-TX | 1/15/2021 | PDF | Amanda Moore | Russell Ramirez | Attorney-Client Privilege | Email regarding upcoming Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0114 | MABA-TX | 4/8/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming meeting agenda, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0115 | MABA-TX | 4/10/2021 | PDF | Russell Ramirez | Steven Aleman; Renee De La Cruz; Belinda Arambula; | Work Product Doctrine; Attorney-Client Privilege | Email regarding developments from Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0116 - LULAC0118 | MABA-TX | 4/9/2021 | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes from Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0119 | MABA-TX | 7/8/2021 | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes regarding legislation and redistricting litigation. |
| LULAC0120 | MABA-TX | 7/8/2021 | PDF | Russell Ramirez | | Work Product Doctrine; Attorney-Client Privilege | Notes regarding legislation and redistricting litigation. |
| LULAC0121 | Proyecto Azteca | 1/12/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney) | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding new proposed rules in Texas Senate regarding redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice.. |
| LULAC0122 | Proyecto Azteca | 1/19/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force, Nina Perales (Attorney) | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding Texas Senate regional hearings on redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0123 - LULAC0127 | Proyecto Azteca | 1/23/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force, Nina Perales (Attorney) | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding regional redistricting hearings, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0128 | Proyecto Azteca | 1/29/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Nina Perales (Attorney), Patricia Gonzales | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0129 - LULAC0130 | Proyecto Azteca | 2/5/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force; Nina Perales (Attorney); Patricia Gonzales | Attorney-Client Privilege | Email to Texas Latino Redistricting Task Force regarding legislative committee assignments, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0131 | Proyecto Azteca | 3/4/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding dates for redistricting committee testimony, including attorney analysis, mental impressions, strategy and/or legal advice. |

| | | | | | | | |
|-----------------------|-----------------|-----------|-----|----------------------------|--|--|--|
| LULAC0132 | Proyecto Azteca | 3/25/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force | Attorney-Client Privilege; Work Product Doctrine | Confidential email to Texas Latino Redistricting Task Force regarding bill-related testimony and analysis of legislation, including attorney analysis, mental impressions, strategy and/or legal advice |
| LULAC0133 | Proyecto Azteca | 3/25/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force | Attorney-Client Privilege; Work Product Doctrine | Confidential email to Texas Latino Redistricting Task Force regarding bill-related testimony and analysis of legislation, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0134 | Proyecto Azteca | 4/5/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege; Work Product Doctrine | Confidential email to Texas Latino Redistricting Task Force regarding upcoming meeting of the group and introduced redistricting legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0135 | Proyecto Azteca | 4/6/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege; Work Product Doctrine | Confidential email to Texas Latino Redistricting Task Force regarding upcoming meeting of the group and introduced redistricting legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0136 | Proyecto Azteca | 4/8/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0137 - LULAC0138 | Proyecto Azteca | 4/26/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding release of U.S. Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0139 - LULAC0140 | Proyecto Azteca | 4/26/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding release of U.S. Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0141 | Proyecto Azteca | 5/7/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding redistricting and other voting-related legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0142 - LULAC0143 | Proyecto Azteca | 5/11/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding redistricting guide and forthcoming meeting, including attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0144 | Proyecto Azteca | 6/15/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force | Attorney-Client Privilege; Work Product Doctrine | Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting about analysis and impressions of Census data and election analysis. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0145 - LULAC0146 | Proyecto Azteca | 7/1/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force, Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearing. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0147 - LULAC0149 | Proyecto Azteca | 7/8/2021 | PDF | Fátima Menendez (Attorney) | Texas Latino Redistricting Task Force, Nina Perales (Attorney) | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0150 | Proyecto Azteca | 7/13/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Michael Mireles, Fátima Menendez (Attorney) | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0151 | Proyecto Azteca | 8/5/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding Census, redistricting, and special session. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0152 - LULAC0153 | Proyecto Azteca | 8/12/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles | Attorney-Client Privilege; Work Product Doctrine | Confidential email to Texas Latino Redistricting Task Force regarding Census and redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |

| | | | | | | | |
|-----------|-----------------|------------|-----|-------------------------|---------------------------------------|--|--|
| LULAC0154 | Proyecto Azteca | 8/23/2021 | PDF | Lydia Camarillo | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0155 | Proyecto Azteca | 8/28/2021 | PDF | Nina Perales (Attorney) | Texas Latino Redistricting Task Force | Attorney-Client Privilege | Confidential email to Texas Latino Redistricting Task Force regarding TLC maps and 2020 Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice. |
| LULAC0156 | LULAC | 11/18/2021 | DOC | Gloria Leal | Rodolfo Rosales and State LULAC Board | Attorney-Client Privilege; Work Product Doctrine | Confidential internal memo regarding redistricting lawsuit, including attorney analysis, mental impressions, strategy and/or legal advice. |
| | | | | | | | |
| | | | | | | | |

* Texas Latino Redistricting Task Force includes the following individuals: Lawrence Romo, Lourdes Flores, Ramona Casas, Tony Villareal, Cesar Espinosa, Gloria Gonzales Dholakia, Jackie Bastard, Patricia, Karina Alvarez, Juan Livas, Juanita Valdez-Cox, Daniel Diaz, Domingo Garcia, Gloria Leal, Jana Ortega, Angelica Razo, Dan Solis, Ann Cass, Amber Arriaga Salinas, Danielle Salgado, Veronica Garza, Paula Barrera, Adriana Cadena, Lydia Camarillo, Patricia Gonzales, Diana Lopez, Stan Paz, Juan Cabrera, Sam Guzman, Pauline Anton, Joey Cardenas, Florinda Chavez, Manuel Grajeda, Roxanne Garza, Juan Manuel Guzman, Camille Martin, Ana Gonzalez, Juan Benitez, Emily Timm, Ana Gonzalez, Brianna Carmen, Pedro Lira, Antonio Arellano, Martha Zapata, Irasema Cavazos, Petra Mata, Virdiana Tule Carrizales, Dayann Pazmino, Jordan Buckley, Jayme Mathias, Vincent Tovar, Hector Sanchez Barba, Elizabeth Bille, Genesis Sanchez, Levar Martin, Angelica Andrade, Norma Herrera, Julio Acosta, Carolina Canizales, Naiyolis Palomo, Lilliana Saldana, Christopher Carmona, Olivia Hernandez, Jesse Romero, Daniel Villanueva, Toni Cordova, Juan Flores, Michelle Tremillo, Jesse Azua, Tiffany Hogue, Adrian Reyna and Vanessa Rodriguez.